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AFFORDABLE CARE, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BOSTON DENTAL GROUP, LLC, a Nevada
limited liability company,

Plaintiff,

vs.

AFFORDABLE CARE, LLC, a North
Carolina limited liability company,

Defendant.

Case No.: 2:16-cv-01636-RFB-CWH

**STIPULATION AND PROPOSED
ORDER TO EXTEND THE PRETRIAL
ORDER DEADLINE TWENTY-EIGHT
(28) DAYS TO NOVEMBER 29, 2018**

(EIGHTH REQUEST)

AND RELATED COUNTERCLAIM

1 Pursuant to LR IA 6-1 and 6-2, it is hereby agreed to and stipulated between
2 Plaintiff/Counterclaim Defendant Boston Dental Group, LLC (“Boston Dental”), by and
3 through its counsel, Michael R. Mushkin & Associates P.C. and Borghese Legal, Ltd., on the
4 one hand, and Defendant/Counterclaim Plaintiff Affordable Care, LLC (“Affordable Care”),
5 by and through its counsel, Kolesar & Leatham and Barack Ferrazzano Kirschbaum &
6 Nagelberg LLP, on the other hand, to a twenty-eight (28) day extension of the November 1,
7 2018 Joint Pretrial Order deadline, until November 29, 2018, for the purpose of allowing the
8 parties to finalize a settlement agreement, as further set forth herein. This is the eighth
9 stipulation for an extension of time to extend the Joint Pretrial Order deadline.

10 On October 5, 2018, this Court extended the Pretrial Order deadline to November 1,
11 2018 to allow the parties time to finalize a settlement agreement in principle. Since that time,
12 the parties have finalized the settlement agreement and are awaiting signatures. In accordance
13 with the terms of the agreement, the parties anticipate filing a stipulation of dismissal of the
14 litigation shortly. Accordingly, the parties seek a brief twenty-eight (28) day extension of the
15 Joint Pretrial Order deadline in order to execute the settlement agreement. The litigation of
16 this matter will be best served by the proposed extension. There is good cause to grant the
17 parties’ eighth stipulation for extension of time because the parties only seek the extension to
18 allow time to execute the settlement agreement. *See Fernandez v. N.V.*, Case No. 2011 WL
19 3957612 at *2 (Dist. Nev. Sept. 6, 2011) (granting motion for extension of time to file pretrial
20 brief because parties engaged in settlement negotiations).

21 Accordingly, the parties stipulate that the deadline for the Joint Pretrial Order be
22 extended for twenty-eight (28) days from November 1, 2018 to November 29, 2018.

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24 **IT IS SO STIPULATED.**
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1 DATED this 1st day of November, 2018

2 **KOLESAR & LEATHAM**

DATED this 1st day of November, 2018

BORGHESE LEGAL, LTD.

3 By /s/ Sharon E. Calhoun

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Attorneys for Plaintiff

Boston Dental Group, LLC

18 **ORDER**

19 **IT IS SO ORDERED.**

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22 UNITED STATES MAGISTRATE JUDGE

23 DATED: November 5, 2018
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